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MAY 26 1993

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

Amendment to Part 61 of the  
Commission's Rules Requiring  
Metric Conversion of Tariff  
Publications and Supporting  
Information

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CC Docket No. 93-55

TO: The Commission

COMMENTS OF  
SOUTHWESTERN BELL TELEPHONE COMPANY

Southwestern Bell Telephone Company (SWBT), by its attorneys, respectfully files these Comments concerning the Commission's April 8, 1993 Notice of Proposed Rulemaking, (NPRM), FCC 93-134. The NPRM proposes to amend Part 61 of the Commission's rules to incorporate metric units of measurement in tariff filings and supporting documentation.<sup>1</sup> SWBT suggests that a voluntary approach to metric conversion would best serve the public interest. However, if the Commission decides that metric conversion is to be mandated, it should select Option I as the conversion option for

Omnibus Trade and Competitiveness Act of 1988 ("Act"), may not necessarily apply to the tariffs of local exchange carriers (LECs), such as SWBT. The Act indicates that conversion should be voluntary and only if such conversion is not "impractical or likely to cause significant inefficiencies". The Commission itself decided to refrain from converting its own tariff publications stating that such a conversion "would cause substantial confusion

corresponding rates to metric units.<sup>3</sup> This option does not require that the metric unit or corresponding rate appear in the tariff or supporting documentation. Option I would be the least burdensome and least costly of the proposals to implement. In addition, it would result in the least amount of confusion for carriers and customers alike while still advancing the goals of metric conversion.

Option II, as proposed, requires the carrier to include, in parentheses, beside the non-metric unit and rate, the metric unit and corresponding rate. Option III, as proposed, requires a carrier to provide in its tariff filing a conversion table with the resulting metric unit and rate clearly shown in the tariff publication and supporting documentation. SWBT strongly opposes both of these options as they would be costly to implement and may cause billing confusion since they depart from current industry practice. An example of the increased cost of implementation for Options II and III is the time necessary to calculate the unit and rate twice: once using the metric system and again using the standard method. In addition, neither option would result in greater public benefit than the proposed Option I.

### III. SWBT SUPPORTS THE COMMISSION'S TWO YEAR PHASE-IN PLAN

If the Commission mandates conversion, SWBT supports the Commission's proposed two year phase-in period for metric conversion. Such a phase-in should somewhat alleviate the cost and

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<sup>3</sup> NPRM, at para 7.

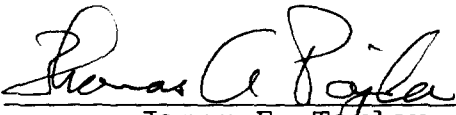
burden of implementation on carriers, particularly the smaller carriers.

IV. CONCLUSION

SWBT urges the Commission to closely scrutinize whether the Act was intended to be applied to domestic business transactions such as those represented by LEC tariffs. Thereafter, the Commission should allow carriers to convert on a strictly voluntary basis. In the alternative, assuming that the Commission determines that a mandatory approach is authorized, the Commission should require no more than its proposed Option I with a two year phase-in schedule for all carriers.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

By   
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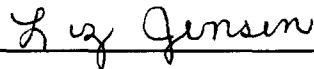
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May 26, 1993

CERTIFICATE OF SERVICE

I, Liz Jensen, hereby certify that the foregoing  
Comments of Southwestern Bell Telephone Company in CC Docket  
No. 93-55, have been served this 26th day of May, 1993 to  
the Parties of Record.

A handwritten signature in cursive script, reading "Liz Jensen", is written over a horizontal line.

Liz Jensen

May 26, 1993

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